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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

PATRICIA FORTLAGE,

Plaintiff,

vs.

HELLER EHRMAN, LLP; HELLER
EHRMAN LONG-TERM DISABILITY
PLAN, and UNUM LIFE INSURANCE CO.
OF AMERICA

Defendants.

Case No. C 08 - 03406 VRW (EMC)

**STIPULATION FOR EXTENSION OF
TIME TO FILE OBJECTIONS TO
MAGISTRATE JUDGE'S REPORT AND
RECOMMENDATIONS AND
~~PROPOSED~~ ORDER THEREON**

Plaintiff Patricia Fortlage and Defendant Heller Ehrman Long Term Disability Plan,
through their undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, Magistrate Judge Edward M. Chen conducted a bench trial in the
above matter on November 17, 2009, and counsel requested a transcript of the hearing at
that time;

1 WHEREAS, Magistrate Judge Chen reviewed the approximately 3,000 pages
2 comprising the Administrative Record in this case and issued his 53-page Report and
3 Recommendations re Proposed Findings of Fact and Conclusions of Law on December
4 18, 2009, such that Plaintiff's Objections are presently due on January 4, 2010;

5 WHEREAS, Plaintiff still has not received a transcript of the proceedings, and the
6 intervening holidays and the press of other litigation make it virtually impossible to
7 complete and file the Objections by said date;

8 NOW THEREFORE, it is hereby stipulated by and between the parties, through
9 their undersigned counsel, that Plaintiff may have to and including January 19, 2010 to file
10 her Objections and Motion for de novo determination pursuant to Civil Local Rule 72-3,
11 and Defendant may have 14 days thereafter to file its Responses thereto.

12
13 DATE: December 21, 2009

LAW OFFICE OF GEOFFREY V. WHITE

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15 By: /s/ Geoffrey V. White
16 GEOFFREY V. WHITE
17 Attorney for Plaintiff

18 DATE: December 21, 2009

GREEN & HUMBERT

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20 By: /s/ Horace W. Green
21 HORACE W. GREEN
22 Attorneys for Defendants

23 PURSUANT TO STIPULATION, IT IS SO ORDERED.

24 DATE: 12/28/2009

25 Honorable V. _____

